

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>09-</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: <u>April 2, 2009</u></b>
<b>JHORDAN GONZALES-SALAZAR</b>	<b>:</b>	<b>VIOLATION:</b>
<b>EMILY LAPUENTE</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy to pass</b>
	<b>:</b>	<b>counterfeit United States currency - 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 472 (passing counterfeit</b>
	<b>:</b>	<b>United States currency with intent to</b>
	<b>:</b>	<b>defraud - 2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	

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**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about November 27, 2008 through on or about December 31, 2008, in the Eastern District of Pennsylvania, defendants

**JHORDAN GONZALES-SALAZAR and  
EMILY LAPUENTE**

conspired and agreed together, and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly and with intent to defraud, pass counterfeit United States currency, in violation of Title 18, United States Code, Section 472.

**MANNER AND MEANS**

2. It was a part of the conspiracy that defendants JHORDAN GONZALES-SALAZAR and EMILY LAPUENTE, together and with others known and unknown to the grand

jury, knowingly used approximately \$6,900 in counterfeit \$100 Federal Reserve Notes to purchase goods at various businesses in the Lehigh Valley, Pennsylvania vicinity.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, defendants JHORDAN GONZALES-SALAZAR and EMILY LAPUENTE committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about November 27, 2008, defendants JHORDAN GONZALES-SALAZAR and EMILY LAPUENTE went to the Wal-Mart at 2601 MacArthur Road, Whitehall, Pennsylvania, together with others known and unknown to the grand jury, and purchased various items, including a laptop computer, iPods, and LCD televisions, costing approximately \$5,400. Defendants GONZALES-SALAZAR and LAPUENTE paid for these items with 54 counterfeit \$100 Federal Reserve Notes.

2. On or about December 6, 2008, defendants JHORDAN GONZALES-SALAZAR and EMILY LAPUENTE went to the BJ's Wholesale Club at 1785 Airport Road, Allentown, Pennsylvania, together with others known and unknown to the grand jury, and purchased various items, including a Sony VGC personal computer, costing approximately \$1,500. Defendants GONZALES-SALAZAR and LAPUENTE paid for these items with 15 counterfeit \$100 Federal Reserve Notes which bore the same serial numbers as the bills passed at Wal-Mart on November 27, 2008.

3. In or about December 2008, defendant EMILY LAPUENTE went to Nancy's Travel at 504 North 7<sup>th</sup> Street, Allentown, Pennsylvania, and attempted to wire approximately \$900 to a person in Peru. Defendant LAPUENTE submitted some genuine Federal

Reserve Notes of different denominations, but also submitted one counterfeit \$100 Federal Reserve Note, which she had received from defendant JHORDAN GONZALES-SALAZAR. This counterfeit \$100 Federal Reserve Note bore the same serial number as one of the counterfeit \$100 Federal Reserve Notes which had been previously passed at Wal-Mart on November 27, 2008 and at BJ's Wholesale Club on December 6, 2008.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

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**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 27, 2008, in Whitehall, in the Eastern District of  
Pennsylvania, defendants

**JHORDAN GONZALES-SALAZAR and  
EMILY LAPUENTE**

with intent to defraud, possessed and passed, and aided and abetted the possession and passing of,  
counterfeit United States currency, that is, approximately \$5,400 in counterfeit \$100 Federal  
Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 6, 2008, in Allentown, in the Eastern District of  
Pennsylvania, defendants

**JHORDAN GONZALES-SALAZAR and  
EMILY LAPUENTE**

with intent to defraud, possessed and passed, and aided and abetted the possession and passing of,  
counterfeit United States currency, that is, approximately \$1,500 in counterfeit \$100 Federal  
Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

**LAURIE MAGID  
United States Attorney**